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15 *Co-Lead Counsel For Plaintiffs*

17 IN THE UNITED STATES DISTRICT COURT
18 FOR THE NORTHERN DISTRICT OF CALIFORNIA

19
20 IN RE: UBER TECHNOLOGIES, INC.,
21 PASSENGER SEXUAL ASSAULT
22 LITIGATION

Case No. 23-md-03084-CRB

22 This Document Relates to:
23 ALL CASES

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL**

25 **TO: THE COURT, PARTIES, AND ALL COUNSEL OF RECORD:**

26 Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs hereby move the Court to consider
27 whether certain materials should be sealed. Plaintiffs file these materials under seal out of an
28

abundance of caution because they contain references to documents produced and marked confidential by Uber.

Material To Be Filed Under Seal

The materials to be filed under seal are portions of Plaintiff's letter brief and exhibits to same:

Document	Description	Designating Party
[Partially Redacted] Joint PTO 8 Letter Regarding Outstanding S-RAD Issues	References to information deemed confidential	Uber
[Partially Redacted] Exhibit A to Joint PTO 8 Letter Regarding Outstanding S-RAD Issues	References to information deemed confidential	Uber
[Partially Redacted] Exhibit B to Joint PTO 8 Letter Regarding Outstanding S-RAD Issues	References to information deemed confidential	Uber
Exhibit D [Filed Under Seal] to Joint PTO 8 Letter Regarding Outstanding S-RAD Issues	References to information deemed confidential	Uber
Exhibit E [Filed Under Seal] to Joint PTO 8 Letter Regarding Outstanding S-RAD Issues	References to information deemed confidential	Uber
Exhibit F [Filed Under Seal] to Joint PTO 8 Letter Regarding Outstanding S-RAD Issues	References to information deemed confidential	Uber
[Partially Redacted] Exhibit H to Joint PTO 8 Letter Regarding Outstanding S-RAD Issues	References to information deemed confidential	Uber

Under Local Rule 79-5(f)(3), Uber bears the responsibility to establish that all of the designated material is sealable and must "file a statement and/or declaration as described in subsection (c)(1)" of the Local Rules. None of the information at issue was marked confidential by Plaintiffs. Pursuant to the Court's order at Dkt. 1559, Uber must file its statement within one day.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Rachel B. Abrams in Support of this Motion; and

2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: September 24, 2025

Respectfully submitted,

By: /s/ Rachel B. Abrams

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